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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

FEDERAL HOUSING FINANCE AGENCY, in its capacity as Conservator of Federal National Mortgage Association; FEDERAL NATIONAL MORTGAGE ASSOCIATION; and, JPMORGAN CHASE BANK, N.A

Plaintiffs,

VS.

LN MANAGEMENT, LLC,

Defendant.

Case No.:2:18-cv-00371-RFB-GWF

STIPULATION AND [PROPOSED] ORDER TO EXTEND BRIEFING SCHEDULE FOR DEFENDANT'S MOTION TO DISMISS

(First Request)

Plaintiffs Federal Housing Finance Agency ("FHFA" or the "Conservator"), in its capacity as Conservator for Federal National Mortgage Association ("Fannie Mae," and together with Freddie Mac, the "Enterprises"), Fannie Mae, and JPMorgan Chase Bank, N.A.(collectively, "Plaintiffs"), and Defendant LN Management, LLC ("LN Management") by and through their attorneys of record, hereby stipulate to extend the deadline for Plaintiffs to respond to LN Management's Motion to Dismiss [ECF No. 20] as follows:

- 1. LN Management filed its Motion to Dismiss ("LN Management's Motion") on July 11, 2018. [ECF No. 20]. Any response is currently due on July 25, 2018.
 - 2. The parties have agreed that more time is necessary for Plaintiffs to respond to

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LN Management's Motion, as counsel for Plaintiffs and Defendant are both preparing for trials during the time the Opposition and Reply would come due, and/or facing other imminent deadlines in many other cases.

3. Based thereon, the parties agree to continue the Opposition deadline to LN Management's Motion to **August 8, 2018**.

This is the first request for an extension of these deadlines, and it is not made for the purposes of delay. The additional time requested is to allow counsel to meaningfully respond to the arguments raised in the Motion.

DATED this 17 th day of July, 2018.	DATED this 17 th day of July, 2018.
FENNEMORE CRAIG, P.C.	SMITH LARSEN & WIXOM
/s/ Leslie Bryan Hart	/s/ Christopher L. Benner
Leslie Bryan Hart, Esq.	Kent F. Larsen, Esq.
Nevada Bar No. 4932	Nevada Bar No. 3463
300 E. Second St. Suite 1510	Christopher L. Benner, Esq.
Reno, NV 89501	Nevada Bar No. 8963
Attorney for Federal Housing Finance	1935 Village Center Circle
Agency, in its capacity as Conservator of	Las Vegas, Nevada 89134-6237
Federal National Mortgage Association	Attorneys for Federal National Mortgage
	Association and JPMorgan Chase Bank, N.A.
DATED this 17 th day of July, 2018.	
KERRY P. FAUGHNAN	
/s/ Kerry P. Faughnan	
Kerry P. Faughnan, Esq.	
Nevada Bar No. 12204	
P.O Box 335361	
North Las Vegas, Nevada 89033	
Attorney for LN Management	

ORDER

IT IS SO ORDERED:

RICHARD F. BÖULWARE, II UNITED STATES DISTRICT JUDGE

DATED this 18th day of July, 2018.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 1, 2018 a true copy of the foregoing Stipulation and [Proposed] Order to Extend Briefing Schedule for Defendant's Motion to Dismiss (First Request) was filed and served via electronically via the court's CM/ECF system to the following:

Kerry P. Faughnan, Esq. P.O Box 335361 North Las Vegas, Nevada 89033 kerry.faughnan@gmail.com Attorney for LN Management

Asim Varma, Esq. Howard N. Cayne, Esq. Michael A.F. Johnson, Esq. ARNOLD & PORTER LLP 601 Massachusetts Avenue NW Washington, DC 20001 asim.varma@aporter.com howard.cayne@aporter.com michael.johnson@aporter.com and Leslie Bryan Hart, Esq. Nevada Bar No. 4932 FENNEMORE CRAIG PC 300 E. Second St. Suite 1510 Reno, NV 89501 lhart@fclaw.com pcarmon@fclaw.com Counsel for Federal Housing Finance Agency

an empløyee of Smith Larsen & Wixom